

REMARKS

In response to the Office Action dated August 28, 2003, claims 1-18 remain in the application. Claims 1, 2, 4, 6, and 11 are amended. New claims 19-21 have been added. No new matter has been introduced. Reexamination and reconsideration of the present application are respectfully requested.

In the Office Action dated August 28, 2003, the Examiner rejected claims 1-3, 5, 6 and 15 under 35 U.S.C. § 103 (a) as being obvious over Mukherjee et al., U.S. Patent No. 5,311,424 (hereinafter Mukherjee) in view of Gregory et al., U.S. Patent No. 6,182,246 (hereinafter Gregory). The Examiner rejected claims 4, 11-14, and 16-18 under 35 U.S.C. § 103(a) as being obvious over Mukherjee in view of Gregory, and in further view of Lewallen, U.S. Patent No. 6,385,769 (hereinafter Lewallen) and in further view of Cleaveland et al., U.S. Patent No. 6,385,765 (hereinafter Cleaveland). The Examiner rejected claims 7 and 9 under 35 U.S.C. § 103(a) as being obvious over Mukherjee in view of Gregory and in further view of Alexander et al., U.S. Patent No. 5,986,654 (hereinafter Alexander). The Examiner rejected claims 8 and 10 under 35 U.S.C. § 103(a) as being obvious over Mukherjee in view of Gregory, and in further view of Elrod et al., U.S. Patent No. 5,455,852 (hereinafter Elrod). The Applicant respectfully traverses the rejections.

The claims of the present invention are directed to a system and method for managing content. A central site supports a generic product with a plurality of features. At least one development site connects to the central site such that each development site can generate and test a customized product of the generic product based on the features of the generic product utilizing tools provided by the central site. Additionally, the customized product may be maintained at the central site for use by all development sites for further customization.

**Independent claim 1 recites:**

A system for managing content, comprising:

**a central site for supporting a generic product with a plurality of features; and**

**at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.**

In the aforementioned Office Action, the Examiner rejected claims 1-3, 5, 6 and 15 under 35 U.S.C. § 103 (a) as being as being obvious over Mukherjee in view of Gregory. (*August 28 Office Action page 2*)

The Mukherjee reference is directed to a system for defining and tracking multiple unique product configurations for purposes of configuration management. (*Mukherjee; Abstract*) Starting with a generic product, a unique product is defined by adding optional features and specially designed components. A range of serial numbers is then assigned for every unique product configuration to enable tracking of multiple product configuration and facilitating material requirements planning and inventory management. (*Mukherjee; Col. 2, lines 45-64*)

The Mukherjee reference does not disclose, teach or suggest the system specified in independent claim 1. Unlike the system specified in independent claim 1, Mukherjee does not teach a system that includes “**a central site for supporting a generic product with a plurality of features and at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.**”

Instead, the Mukherjee reference discloses a system of *data processing* wherein a product serial number effectivity is assigned to each unique customer specified product configuration and

to the base product configuration in order to maintain multiple time oriented versions of the product thus supporting simultaneously both customer specified and design specified engineering changes to the base product. A list or bill of materials is maintained for each product reflecting the generic product, additional features and configuration changes. (*Mukherjee; Abstract; Col. 4, line 20 – Col. 5, line 21 and FIG. 4*)

The system described in Mukherjee is clearly dissimilar to the system specified in independent claim 1. Independent claim 1 distinguishes over Mukherjee for several reasons. First, the Mukherjee reference does not teach that there is at least one development site connected to the central site wherein each of the development sites generates the customized product. Rather, the Mukherjee reference discloses a product configuration process in which design engineers may store and retrieve product configuration information including Engineering Change Notices and Bill of Material data in a relational database. (*Mukherjee; Col 3 lines 35-48*) Although, the Mukherjee reference teaches that a generic product may be customized by adding optional sales features selected by a customer, that reference makes no mention at all of a development site nor does it mention that a customized product is generated within the product configuration process.

In addition, the Mukherjee reference does not disclose teach or suggest that the customized product is maintained at the central site. Further, as the Examiner has acknowledged, “the Mukherjee reference does not disclose that the customized product is tested at the central site.” (*August 28 Office Action, page 2*) Accordingly, the Applicant respectfully submits that independent claim 1 distinguishes over the Mukherjee reference.

The Gregory reference does not make up for the deficiencies of the Mukherjee reference. The Examiner uses the Gregory reference to show that the customized product is tested. The

Examiner states Gregory discloses a software testing system on a host computer. However, the Gregory reference does not disclose “*at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.*” Accordingly, the Applicant respectfully submits that independent claim 1 further distinguishes over Gregory in combination with Mukherjee.

The Lewallen reference does not make up for the deficiencies of Mukherjee and Gregory. The Examiner utilizes Lewallen to show a parameter generation module that generates a plurality of custom features. Lewallen is directed to a system to convert text based object oriented class code into proxy components which can be used in existing visual builders. (*Lewallen; Col. 5, lines 45-49; Col. 8, lines 41-51 and Figure 2*)

However, the combination of Lewallen, Mukherjee and Gregory does not disclose “*at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.*” Accordingly, the Applicant respectfully submits that independent claim 1 further distinguishes over Lewallen in combination with Mukherjee and Gregory.

The Cleaveland reference does not make up for the deficiencies of Mukherjee, Gregory and Lewallen. The Examiner utilizes Cleaveland to show a visual diagram generator. (*August 28 Office Action, page 6*) The Cleaveland reference is directed to software which is designed to generate and analyze concurrent and distributed systems using graphical and textual editors. (*Cleaveland; Col. 2, lines 49-65*) Although Cleaveland discloses a graphical simulator including a process viewer tool to pan through a graphical process specification, the combination of

Cleaveland, Lewallen, Murkherjee and Gregory still does not disclose “*at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.*”

Accordingly, the Applicant respectfully submits that independent claim 1 further distinguishes over Cleaveland in combination with Mukherjee, Gregory, and Lewallen.

The Alexander reference does not make up for the deficiencies of Mukherjee, Gregory, Lewallen, and Cleaveland. The Examiner utilizes Alexander to show that the managed product is a web page wherein the web page as either a generic or customized product. (*August 28 Office Action, page 11*) Nevertheless, the combination of Alexander, Cleaveland, Lewallen, Murkherjee and Gregory does not disclose “*at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized product at said central site.*” Accordingly, the Applicant respectfully submits that independent claim 1 further distinguishes over Alexander in combination with Mukherjee, Gregory, Lewallen, and Cleaveland.

The Elrod reference does not make up for the deficiencies of Mukherjee, Gregory, Lewallen, Cleaveland and Alexander. The Examiner utilizes Elrod to show that the managed content is a protocol as either a generic or customized product. (*August 28 Office Action, page 12*) However, the combination of Elrod, Alexander, Cleaveland, Lewallen, Murkherjee and Gregory does not disclose “*at least one development site connecting to the central site, each of the at least one development site generating a customized product of the generic product based on the plurality of features, testing said customized product, and maintaining said customized*

*product at said central site.*" Accordingly, the Applicant respectfully submits that independent claim 1 further distinguishes over Elrod in combination with Mukherjee, Gregory, Lewallen, Cleaveland, and Alexander.

Claim 2, as amended, and claims 3 and 5 are directly or indirectly dependent from independent claim 1. Accordingly, the Applicant respectfully submits that dependent claim 2, as amended and dependent claims 3 and 5 distinguish over Gregory in combination with Mukherjee for the same reasons discussed above with respect to independent claim 1.

Independent claim 6, as amended, and independent claim 15 recite similar limitations to independent claim 1. Accordingly, the Applicant respectfully submits that independent claim 6, as amended and independent claim 15 distinguish over Gregory in combination with Mukherjee for reasons similar to those set forth above with respect to independent claim 1.

The Examiner rejected claims 4, 11-14, and 16-18 under 35 U.S.C. § 103 (a) as being obvious over Mukherjee in view of Gregory, and in further view of Lewallen and in further view of Cleaveland. (*August 28 Office Action page 5*)

Claims 4, 11-14 and 16-18 are directly or indirectly dependent from independent claim 1, independent claim 6, as amended and independent claim 15, respectively. Accordingly, the Applicant respectfully submits that dependent claims 4, 11-14, and 16-18 all distinguish over Mukherjee in combination with Gregory, Lewallen and Cleaveland for the same reasons discussed above with respect to independent claim 1, independent claim 6, as amended and independent claim 15, respectively.

The Examiner rejected claims 7 and 9 under 35 U.S.C. § 103(a) as being obvious over Mukherjee in view of Gregory and in further view of Alexander. (*August 28 Office Action, page*

11)

Claims 7 and 9 both depend directly from independent claim 6, as amended.

Accordingly, the Applicant respectfully submits that dependent claims 7 and 9 both distinguish over Mukherjee in combination with Gregory and Alexander for the same reasons discussed above with respect to independent claims 6, as amended.

The Examiner rejected claims 8 and 10 under 35 U.S.C. § 103(a) as being obvious over Mukherjee in view of Gregory, and in further view of Elrod. (*August 28 Office Action, pages 11 and 12*)

Claims 8 and 10 both depend directly from independent claim 6, as amended.

Accordingly, the Applicant respectfully submits that dependent claims 8 and 10 both distinguish over Mukherjee in combination with Gregory and Elrod for the same reasons discussed above with respect to independent claims 6, as amended.

**New Independent claim 19 recites:**

A central site supporting a generic product with a plurality of features to receive a request to test a customized product, wherein the customized product is generated by at least one development site based on the generic product and the plurality of features and is maintained at the central site.

None of the cited references disclose, teach or suggest the invention as claimed in independent claim 19. Claim 19 recites similar limitations to independent claim 1. Accordingly, the Applicant respectfully submits that new independent claim 19 distinguishes over Elrod in combination with Mukherjee, Gregory, Lewallen, Cleaveland, and Alexander for reasons similar to those set forth above with respect to independent claim 1.

Claims 20 and 21 are directly dependent from independent claim 19. Accordingly, the Applicant respectfully submits that dependent claims 20 and 21 both distinguish over Elrod in

combination with Mukherjee, Gregory, Lewallen, Cleaveland, and Alexander for the same reasons discussed above with respect to independent claims 19.

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

The Applicant respectfully submits that the claims are in condition for allowance. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference call would advance prosecution of the application.

Respectfully submitted,

PILLSBURY WINTHROP LLP

Date: May 20, 2004

By:   
Roger R. Wise  
Registration No. 31,204  
Attorney For Applicants

725 South Figueroa Street, Suite 2800  
Los Angeles, CA 90017-5406  
Telephone: (213) 488-7100  
Facsimile: (213) 629-1033